UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TRUSTEES of the SHEET METAL WORKERS' LOCAL UNION NO. 28 FUNDS and PLANS, individually named herein as SHEET METAL WORKERS' LOCAL UNION NO. 28 VACATION FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 WELFARE FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 SUPPLEMENTAL UNEMPLOYMENT FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 ANNUITY FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 PENSION FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 JOINT LABOR MANAGEMENT FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 EDUCATION FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 SCHOLARSHIP FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 ASSESSMENTS FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28

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Civil Case No.: 21-cv-1868 (PAE)

NOTICE OF MOTION FOR DEFAULT JUDGMENT

Plaintiffs,

-against-

POLITICAL ACTION FUND, SHEET METAL

WORKERS' LOCAL UNION NO. 28 BUILDING FUND, and INTERNATIONAL ASSOCIATION OF SHEET METAL, AIR, RAIL AND TRANSPORTATION WORKERS' LOCAL UNION NO. 28, AFL-CIO,

:

BO GUARDS MECHANICALS LLC,

Defendant.

PLEASE TAKE NOTICE that upon the Declaration of Thomas P. Keane, Esq. with attached exhibits dated June 15, 2021, Affidavit of Glen Camisa with attached exhibits dated June 14, 2021 and Proposed Default Judgment, Plaintiffs, TRUSTEES of the SHEET METAL WORKERS' LOCAL UNION NO. 28 FUNDS and PLANS, individually named herein as SHEET METAL WORKERS' LOCAL UNION NO. 28 VACATION FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 WELFARE FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 SUPPLEMENTAL UNEMPLOYMENT FUND, SHEET METAL

WORKERS' LOCAL UNION NO. 28 ANNUITY FUND, SHEET METAL WORKERS' LOCAL

UNION NO. 28 PENSION FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28

JOINT LABOR MANAGEMENT FUND, SHEET METAL WORKERS' LOCAL UNION NO.

28 EDUCATION FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28

SCHOLARSHIP FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28

ASSESSMENTS FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 POLITICAL

ACTION FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 BUILDING FUND,

and INTERNATIONAL ASSOCIATION OF SHEET METAL, AIR, RAIL AND

TRANSPORTATION WORKERS' LOCAL UNION NO. 28, AFL-CIO, will move this Court,

before the Honorable Paul A. Engelmayer, United States District Judge, at the United States

Courthouse for the Southern District of New York located at 40 Foley Square, Courtroom 435,

New York, New York 10007 on a date to be determined by the Court, for an Order pursuant to

Rule 55 of the Federal Rules for Civil Procedure granting judgment by default against Defendant.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 15, 2021

Woodbury, New York

Respectfully submitted,

COLLERAN, O'HARA & MILLS L.L.P.

By:

THOMAS P. KEANE (TK4425)

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